

<u>SUBJECT</u>		<u>DATE</u>
1056. PCB Reporting and Recordkeeping Relief	ENCORE	JAN 12, 2014
1057. Commercial Chemical Products and Unused Batteries	ENCORE	JAN 16, 2014
1058. PCB Annual Records Retention Timeframes		JAN 31, 2014
1059. Satellite Accumulation within a ≤90-day Accumulation Area		FEB 7, 2014
1060. PCB Certificate of Disposal Relief	ENCORE	FEB 13, 2014
1061. Used Oil and Weekly Inspections		FEB 20, 2014
1062. Bags and RCRA Container Definition		FEB 27, 2014
1063. Product Storage Tank Residues and Hazardous Waste Regulations	ENCORE	MAR 6, 2014
1064. Spent Lead-Acid Batteries and Accumulation Time Limits		MAR 13, 2014
1065. Land Disposal Restrictions and Dates of Accumulation		MAR 23, 2014
1066. Universal Waste Accumulation Time Limits and the One Year Rule		MAR 29, 2014
1067. PCB Manifest Discrepancy Reports and Estimated Waste Weights		APR 6, 2014
1068. PCB Wastes, Independent Transporters and Confirmation of Receipt		APR 10, 2014
1069. Paint Wastes and The Applicability of the F001-F005 Listings to Ingredients	ENCORE	APR 20, 2014
1070. Other Paint Wastes and the Applicability of the F001-F005 Listings	ENCORE	APR 24, 2014
1071. Multiple Characteristic Hazardous Waste Codes and Underlying Hazardous Constituents		MAY 1, 2014
1072. TSCA "No PCBs" versus "Non-PCBs" versus "Nondetectable PCBs"	ENCORE	MAY 8, 2014
1073. Purpose of Keeping a Hazardous Waste Container Closed	ENCORE	MAY 15, 2014
1074. PCB Containers and Multiple Removed From Service Dates		MAY 22, 2014
1075. Satellite Accumulation and RCRA Personnel Training		MAY 29, 2014
1076. Transporter Signatures on Hazardous Waste Manifest and Multiple Drivers		JUN 5, 2014
1077. Universal Waste and Nonhazardous Batteries		JUN 12, 2014
1078. Universal Waste and Incandescent Bulbs		JUN 19, 2014
1079. The PCB Mark and the Fields "Also Contact" and "Tel No"	ENCORE	JUN 29, 2014
1080. Halon Fire Extinguishers - Banned or Not Banned?	ENCORE	JUL 5, 2014
1081. Cabinets as RCRA Containers	ENCORE	JUL 13, 2014
1082. LDR Storage Prohibitions and Treated Wastes	ENCORE	JUL 17, 2014
1083. LDR Treatment Standards and F001 "Chlorinated Fluorocarbons"	ENCORE	JUL 24, 2014
1084. RCRA Regulatory Status of Chlorinated Fluorocarbons Used as Refrigerants	ENCORE	JUL 31, 2014
1085. Universal Wastes, Manifesting and DOT Shipping Names		AUG 7, 2014
1086. CERCLA Hazardous Substances – A Brief Definition		AUG 14, 2014
1087. CERCLA Hazardous Substances – The Petroleum Exclusion		AUG 21, 2014
1088. PCB Concentration Assumptions for Use vs. PCB Disposal	ENCORE	AUG 28, 2014
1089. Universal Waste and Basis for the One Year Accumulation Time Limit		SEP 4, 2014
1090. Product Spills and Waste Determinations	ENCORE	SEP 11, 2014
1091. PCB Concentrations and 10,000 PPM		SEP 18, 2014
1092. PCB Concentrations and 1,000 PPM		SEP 25, 2014

DISCLAIMER - "Two Minute Training" ("2MT") is a peer-to-peer communication, presented to share the benefit of the author's work experience with other professionals, who can independently evaluate his analysis. 2MT does not necessarily reflect the opinions, conclusions or policies of the author's past or current employers or the US Department of Energy. The author's employers do not take any responsibility for the accuracy of its conclusions. 2MT is not intended to be used as authoritative guidance or direction by any person or entity. Anyone transmitting or reproducing it is prohibited from modifying its content, this disclaimer, or other text, or republishing it independent of its original source.

TWO MINUTE TRAINING

TO: CH2M HILL PLATEAU REMEDIATION COMPANY

FROM: PAUL W. MARTIN, Senior Environmental Compliance Officer
CHPRC Environmental Protection, Hanford, WA

SUBJECT: PCB CONCENTRATIONS AND 1,000 PPM

DATE: SEPTEMBER 25, 2014

<u>CHPRC Projects</u>	<u>CH PRC - Env. Protection</u>	<u>MSA</u>	<u>Hanford Laboratories</u>	<u>Other Hanford Contractors</u>	<u>Other Hanford Contractors</u>
Richard Austin Tania Bates Ty Blackford Bob Cathel Rene Catlow Richard Clinton Larry Cole John Dent Brian Dixon Eric Erpenbeck Tom Gilmore Stuart Hildreth Mike Jennings Stephanie Johansen Dan Kimball Jeanne Kisielnicki Melvin Lakes Jim McGrogan Stuart Mortensen Dean Nester Dave Richards Phil Sheely Connie Simiele Roni Swan Michael Waters Jeff Westcott Jeff Widney	Brett Barnes Ron Brunke Bill Cox Lorna Dittmer Rick Engelmann Jim Leary Dale McKenney Rick Oldham Linda Petersen Fred Ruck Jennie Seaver Wayne Toebe Lee Tuott Daniel Turlington Dave Watson Joel Williams	Jerry Cammann Jeff Ehlis Garin Erickson Lori Fritz Panfilo Gonzales Jr. Darlene Hagel Dashia Huff Mark Kamberg Edwin Lamm Candice Marple Saul Martinez Matt Mills Anthony Nagel Jennifer Ollero Jon Perry Thomas Pysto Phillip Rogers Don Rokkan Lana Strickling Lou Upton Christina Zerby	Alan Campbell Grant McCalmant <u>DOE RL, ORP, WIPP</u> Mary Beth Burandt Cliff Clark Mike Collins Tony McKarns Ellen Mattlin Greg Sinton Scott Stubblebine	Bill Bachmann Dean Baker Scott Baker Lucinda Borneman Paul Crane Tina Crane Greta Davis Jeff DeLine Ron Del Mar John Dorian Mark Ellefson Darrin Faulk Joe Fritts Rob Gregory Gene Grohs James Hamilton Andy Hobbs Ryan Johnson Megan Lerchen Richard Lipinski Charles (Mike) Lowery Michael Madison Terri Mars Cary Martin Steve Metzger Tony Miskho Tom Moon Chuck Mulkey Judith Nielsen Mandy Pascual Kirk Peterson Jean Quigley Mark Rollison Dan Saueressig Merrie Schilperoort Joelle Stamm	Glen Triner Greg Varljen Julie Waddoups Kyle Webster Ted Wooley

DISCLAIMER - "Two Minute Training" ("2MT") is a peer-to-peer communication, presented to share the benefit of the author's work experience with other professionals, who can independently evaluate his analysis. 2MT does not necessarily reflect the opinions, conclusions or policies of the author's past or current employers or the US Department of Energy. The author's employers do not take any responsibility for the accuracy of its conclusions. 2MT is not intended to be used as authoritative guidance or direction by any person or entity. Anyone transmitting or reproducing it is prohibited from modifying its content, this disclaimer, or other text, or republishing it independent of its original source.

TWO MINUTE TRAINING

SUBJECT: PCB Concentrations and 1,000 PPM

Q: Last week's "Two Minute Training" (2MT) addressed that most customers know the significance of the concentration ≥ 50 ppm PCB waste, i.e., it is PCB regulated, and that there are instances of regulated PCB waste with concentrations at or near 10,000 ppm. So what about the next concentration level - are there any instances of regulated PCB wastes with concentrations at or near 1,000 ppm that can be subject to other specific requirements of 40 CFR 761?

A: Yes there are!

40 CFR 761.30(a)(2)(v)(A) and 40 CFR 761.30(h)(2)(v)(A) concern removal of free-flowing PCB dielectric fluid from transformers, electromagnets, switches, or voltage regulators. Flushing of the equipment is not required. Either test the fluid or assume it contains $\geq 1,000$ ppm PCBs.

40 CFR 761.30(b)(1) concerns the prohibition on the use of railroad transformers that contain dielectric fluids with a PCB concentration of $>1,000$ ppm. 40 CFR 761.30(b)(2)(ii) states that after January 1, 1984, railroad transformers may only be serviced with dielectric fluid containing $<1,000$ ppm PCB.

40 CFR 761.60(b)(3)(ii) concerns PCB hydraulic machines and the removal and disposal of free-flowing liquid. If the PCB liquid contains $\geq 1,000$ ppm PCB, then the hydraulic machine must be decontaminated or flushed prior to disposal with an approved solvent that contains <50 ppm PCB.

These were the only five citations referencing "1,000 ppm" PCBs in 40 CFR 761.

SUMMARY:

- PCB wastes are generally regulated if the PCB concentration is ≥ 50 ppm.
- PCB wastes can have specific requirements if concentrations are in the 1,000 ppm range.
- There are five citations referencing PCB concentrations at or near 1,000 ppm and all address PCB liquids in terms of removal, disposal, use, servicing or decontamination.

Excerpts from 40 CFR 761.30 and 40 CFR 761.60 are attached to the e-mail. If you have any questions, please contact me at "Paul_W_Martin@rl.gov" or at (509) 376-6620.

FROM: Paul W. Martin

DATE: 9/25/14

FILE: c:\...\2MT\2014\091414.rtf

PG: 1

DISCLAIMER - "Two Minute Training" ("2MT") is a peer-to-peer communication, presented to share the benefit of the author's work experience with other professionals, who can independently evaluate his analysis. 2MT does not necessarily reflect the opinions, conclusions or policies of the author's past or current employers or the US Department of Energy. The author's employers do not take any responsibility for the accuracy of its conclusions. 2MT is not intended to be used as authoritative guidance or direction by any person or entity. Anyone transmitting or reproducing it is prohibited from modifying its content, this disclaimer, or other text, or republishing it independent of its original source.

TWO MINUTE TRAINING - ATTACHMENT

SUBJECT: PCB Concentrations and 1,000 PPM

40 CFR §761.30 Authorizations

The following non-totally enclosed PCB activities are authorized pursuant to section 6(e)(2)(B) of TSCA:

(a) *Use in and servicing of transformers (other than railroad transformers).* PCBs at any concentration may be used in transformers (other than in railroad locomotives and self-propelled railroad cars) and may be used for purposes of servicing including rebuilding these transformers for the remainder of their useful lives, subject to the following conditions:

(2) *Servicing conditions.*

(v) You may reclassify a PCB Transformer that has been tested and determined to have a concentration of ≥ 500 ppm PCBs to a PCB-Contaminated transformer (≥ 50 but < 500 ppm) or to a non-PCB transformer (< 50 ppm), and you may reclassify a PCB-Contaminated transformer that has been tested and determined to have a concentration of ≥ 50 ppm but < 500 ppm to a non-PCB transformer, as follows:

(A) Remove the free-flowing PCB dielectric fluid from the transformer. Flushing is not required. Either test the fluid or assume it contains $\geq 1,000$ ppm PCBs. Retrofill the transformer with fluid containing known PCB levels according to the following table. Determine the transformer's reclassified status according to the following table (if following this process does not result in the reclassified status you desire, you may repeat the process):

(b) *Use in and servicing of railroad transformers.* PCBs may be used in transformers in railroad locomotives or railroad self-propelled cars ("railroad transformers") and may be processed and distributed in commerce for purposes of servicing these transformers in a manner other than a totally enclosed manner subject to the following conditions:

(1) *Use restrictions.* After July 1, 1986, use of railroad transformers that contain dielectric fluids with a PCB concentration $> 1,000$ ppm is prohibited.

(2) *Servicing restrictions.*

(ii) After January 1, 1984, railroad transformers may only be serviced with dielectric fluid containing less than $1,000$ ppm PCB, except as provided in paragraph (b)(2)(i) of this section;

FROM: Paul W. Martin

DATE: 9/25/14

FILE: c:\...2MT\2014\091414.rtf

PG: 2

DISCLAIMER - "Two Minute Training" ("2MT") is a peer-to-peer communication, presented to share the benefit of the author's work experience with other professionals, who can independently evaluate his analysis. 2MT does not necessarily reflect the opinions, conclusions or policies of the author's past or current employers or the US Department of Energy. The author's employers do not take any responsibility for the accuracy of its conclusions. 2MT is not intended to be used as authoritative guidance or direction by any person or entity. Anyone transmitting or reproducing it is prohibited from modifying its content, this disclaimer, or other text, or republishing it independent of its original source.

TWO MINUTE TRAINING - ATTACHMENT

SUBJECT: PCB Concentrations and 1,000 PPM

40 CFR §761.30 Authorizations

(h) *Use in and servicing of electromagnets, switches and voltage regulators.* PCBs at any concentration may be used in electromagnets, switches (including sectionalizers and motor starters), and voltage regulators and may be used for purposes of servicing this equipment (including rebuilding) for the remainder of their useful lives, subject to the following conditions:

(2) *Servicing conditions.*

(v) You may reclassify an electromagnet, switch, or voltage regulator that has been tested and determined to have a concentration of ≥ 500 ppm PCBs to PCB-Contaminated status (≥ 50 but < 500 ppm) or to non-PCB status (< 50 ppm), and you may reclassify a PCB-Contaminated electromagnet, switch, or voltage regulator that has been tested and determined to have a concentration of ≥ 50 ppm but < 500 ppm to a non-PCB status, as follows:

(A) Remove the free-flowing PCB dielectric fluid from the electromagnet, switch, or voltage regulator. Flushing is not required. Either test the fluid or assume it contains $\geq 1,000$ ppm PCBs. Retrofill the electromagnet, switch, or voltage regulator with fluid containing known PCB levels according to the following table. Determine the electromagnet, switch, or voltage regulator's reclassified status according to the following table (if following this process does not result in the reclassified status you desire, you may repeat the process):

40 CFR §761.60 Disposal requirements

(b) *PCB Articles.* This paragraph does not authorize disposal that is otherwise prohibited in §761.20 or elsewhere in this part.

(3) *PCB hydraulic machines.*

(i) Any person disposing of PCB hydraulic machines containing PCBs at concentrations of ≥ 50 ppm, such as die casting machines shall do so by one of the following methods:

(A) In accordance with §761.79.

(B) In a facility which is permitted, licensed, or registered by a State to manage municipal solid waste subject to part 258 of this chapter or non-municipal non-hazardous waste subject to §§257.5 through 257.30 of this chapter, as applicable (excluding thermal treatment units).

(C) In a scrap metal recovery oven or smelter operating in compliance with §761.72.

(D) In a disposal facility approved under this part.

(ii) All free-flowing liquid must be removed from each machine and the liquid must be disposed of in accordance with the provisions of paragraph (a) of this section. If the PCB liquid contains $\geq 1,000$ ppm PCB, then the hydraulic machine must be decontaminated in accordance with §761.79 or flushed prior to disposal with a solvent listed at paragraph (b)(1)(i)(B) of this section which contains < 50 ppm PCB. The solvent must be disposed of in accordance with paragraph (a) of this section or §761.79.

FROM: Paul W. Martin

DATE: 9/25/14

FILE: c:\...2MT\2014\091414.rtf

PG: 3

DISCLAIMER - "Two Minute Training" ("2MT") is a peer-to-peer communication, presented to share the benefit of the author's work experience with other professionals, who can independently evaluate his analysis. 2MT does not necessarily reflect the opinions, conclusions or policies of the author's past or current employers or the US Department of Energy. The author's employers do not take any responsibility for the accuracy of its conclusions. 2MT is not intended to be used as authoritative guidance or direction by any person or entity. Anyone transmitting or reproducing it is prohibited from modifying its content, this disclaimer, or other text, or republishing it independent of its original source.